

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

TRUSTEES OF THE PENSION, WELFARE AND	)	
VACATION FRINGE BENEFIT FUNDS OF	)	
IBEW LOCAL 701,	)	No. 22-CV-5959
Plaintiffs	)	
vs.	)	Judge Blakey
	)	
JONES ELECTRICAL CONTRACTORS, INC., an	)	Magistrate Finnegan
Illinois corporation,	)	
	)	
Defendant.	)	

**PLAINTIFF'S MOTION FOR JUDGMENT IN SUM CERTAIN**

Plaintiffs Trustees of the Pension, Welfare and Vacation Fringe Benefit Funds of IBEW Local 701, by and through their attorneys, Grant R. Piechocinski and ARNOLD AND KADJAN, LLP, hereby move this Court to enter an order for judgment in sum certain against Defendant JONES ELECTRICAL CONTRACTORS, INC. In support of their Motion, the Plaintiffs state as follows:

1. This is an action to recover delinquent fringe benefit fund contributions which are due and owing based on Collective Bargaining Agreements, Declarations of Trust and provisions of ERISA.
2. The corporate Defendant was served with the Summons and Complaint on November 7, 2022.
3. This Court entered an order of Default against the Defendant on December 5, 2022 (Docket Entry 6).
4. Defendant owes the Plaintiffs \$40,047.83 as evidenced by a fringe benefit audit for the period of October 20, 2020 through December 31, 2022. This amount breaks down to

\$35,404.86 in contributions; \$3,540.47 in liquidated damages on those contributions; and \$1,102.50 in audit costs. (Ex. A – Wolf Declaration).

5. Defendant also owes a total of \$2,572.00 in attorneys' fees and costs. (Ex. B – Piechocinski Declaration).

6. Therefore, Defendant, JONES ELECTRICAL, INC. owes a total of \$42,619.83 in this matter.

WHEREFORE, Plaintiffs pray for the following relief:

A. That this Court enter judgment in favor of the Plaintiffs and against the Defendant JONES ELECTRICAL, INC. in the amount of \$42,619.83; and

B. That this Court provide any such other or further relief it deems appropriate under the circumstances.

Respectfully submitted,

IBEW LOCAL 701 FRINGE BENEFIT FUNDS

s/ Grant R. Piechocinski

One of their attorneys

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of June 2023, a copy of foregoing was filed electronically. Copies of this filing will be sent to below via U.S. Mail, first class, postage prepaid. Parties may access this filing through the Court's system.

Jones Electrical Contractors, Inc.  
c/o Kanika Jones its registered agent  
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Peoria, IL 61615

/s/Grant R. Piechocinski  
*One of Plaintiffs' Attorneys*

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